

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
ALEXANDRIA DIVISION**

HANAN ELATR KHASHOGGI,

Plaintiff,

v.

NSO GROUP TECHNOLOGIES LTD.  
and Q CYBER TECHNOLOGIES LTD.,

Defendants.

Case No. 1:23-cv-779-LMB-LRVVAED

Action Filed: June 15, 2023

**DEFENDANTS' NON-CONFIDENTIAL [PROPOSED] ORDER**

This matter is currently before the Court on Defendants NSO Group Technologies LTD. and Q Cyber Technologies LTD.'s Motion for Leave to File Under Seal, filed on September 29, 2023. This Court, having considered the Motion to Seal and the Memorandum and Declaration of Aaron S. Craig filed in support thereof, finds that good cause supports the sealing of the following materials:

| <b>Documents to be Sealed</b>   | <b>Portion to be Sealed</b>                                     |
|---|---|
| Declaration of Aaron S. Craig in Support of Defendants' Motion to File Under Seal       | Indicated portions of paragraphs 3-11, 13                       |
| Defendants' Motion to Dismiss   | Indicated portions of pages: 3-5, 12-13, 17-19, 21-22           |
| Declaration of Roy Blecher in Support of Defendants' Motion to Dismiss and Exhibits A-D | Indicated portions of paragraphs 3-8<br>Exhibits A, B, C, and D |

The Documents to be Sealed contain traditionally non-public information for which there is no constitutional right of access. *See, e.g., N.Y. Times Co. v. Dep't of Justice*, 806 F.3d 682, 688 (2d Cir. 2015). Moreover, the spirit of international comity counsels that the Documents to be Sealed be kept confidential. *See, e.g., Compal Elecs., Inc. v. Apple Inc.*, 2017 WL 11423604, at \*3 (S.D. Cal. Sept. 5, 2017).

The Motion to Seal is GRANTED, and the documents described above are to be filed under

seal. To the extent it is necessary in future court filings in this case for the parties to make reference to the sealed content of the Sealed Document, those matters may also be filed under seal pursuant to this Order.

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

---

THE HONORABLE LEONIE M. BRINKEMA  
UNITED STATES DISTRICT JUDGE